to Don
From Smitty

EPA

P 360 177 077

CERTIFIED MAIL RECEIPT # ~~Z 000 000 000~~

Benny Webb
Mr ~~/Ms Facility Rep~~
~~Company Name~~ Arkansas Terminaling & Trading
~~Correspondence Address~~ Route 1 Box 67A Central
~~City, State, Zip Code~~ North Little Rock, Arkansas 72117

RE FRP/SPCC/EPCRA Inspection Report
~~Facility Name~~ Arkansas Terminaling & Trading
FRP-06-~~(2-Letter State Code) (5-digit number)~~ AR-00042
FY~~(Assigned FY number for FRP)~~ 97013

Dear Mr ~~/Ms Facility Rep~~ Webb

On ~~(date of inspection)~~, March 27, 1997 representatives of the U S Environmental Protection Agency (EPA) conducted an Oil Pollution Prevention (40 CFR Part 112) inspection The inspection included a Facility Response Plan (FRP) Spill Prevention Control and Countermeasure (SPCC) and Emergency Planning and Community Right-to-Know Act (EPCRA) compliance review for the above named facility During the compliance review the following deficiencies were noted

FACILITY RESPONSE PLAN

[For specific deficiencies see Attachment A Facility Response Plan Checklist]

The facility owner/operator has not implemented the requirements as per section 4202(a)(5)(E)(ii) of the Oil Pollution Act of 1990 as codified in 40 CFR Part 112 20 due to the deficiencies listed below

F1 The FRP is not prepared and submitted in accordance with 40 CFR Part 112 20

F2 FRP amendment(s) not submitted in accordance with 40 CFR Part 112 20

F3 The facility owner/operator did not maintain the substantial harm certification as required by 40 CFR Part 112 20(e)

F4 FRP is not consistent with NCP/ACP as required by 40 CFR Part 112 20(g) NCP/ACP require coordination mitigation communication containment and removal constituents

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o F5 Contents of plan are not consistent with model plan as required by 40 CFR Part 112 20 (h) or its equivalent See Attachment A FRP Checklist All items must be addressed or stated as non-applicable

o F6 Incomplete facility information as required by 40 CFR Part 112 20 (h)(2) See section 1 2 of FRP the checklist

o F7 Inadequate emergency response information as required by 40 CFR Part 112 20 (h)(3) Incomplete emergency notification phone list see section 1 3 1 of the FRP checklist Incomplete response equipment list See section 1 3 2 of the FRP checklist Incomplete response equipment testing and/or drill logs, see section 1 3 3 of the FRP checklist Incomplete response personnel information, see section 1 3 4 of the FRP checklist Incomplete evacuation plans see section 1 3.5 of the FRP checklist. Incomplete description of qualified individuals duties, see section 1 3 6 of the FRP checklist

o F8 Insufficient hazard evaluation information as required by 40 CFR Part 112 20(h)(4) Incomplete hazard identification information see section 1 4.1 of the FRP checklist Incomplete analysis of oil spill effects on vulnerable areas See section 1 4 2 of the FRP checklist Incomplete analysis of potential for an oil spill, see section 1 4 3 of the FRP checklist Inadequate discussion of oil spill history, see section 1 4 4 of the FRP checklist

o F9 Inadequate discussion of response planning levels as required by 40 CFR Part 112 20 (h)(5) Incomplete ~~or no~~ description of small and/or medium discharge scenarios see section 1 5 1 of the FRP checklist Incomplete ~~or no~~ description of worst case scenario see section 1 5 2 of the FRP checklist

F10 Inadequate discussion of discharge detection as required by 40 CFR Part 112 20(h)(6) Incomplete description of discharge detection systems see section 1 6 of the FRP checklist

o F11 Inadequate discussion of plan implementation as required by 40 CFR Part 112 20 (h)(7) Incomplete identification and/or description of response resources see section 1 7 1 of the FRP checklist Disposal plans incomplete, see section 1 7 2 of the FRP checklist Incomplete or no description of containment and/or drainage plan See section 1 7 3 of the FRP checklist

o F12 Inadequate self inspection, drills/exercises and response training as required by 40 CFR Part 112 20 (h)(8) Incomplete self-inspection, see section 1 8 1 of the FRP checklist Incomplete description of facility drills exercises and/or logs, see section 1 8 2 of the FRP checklist Incomplete description of response training and/or logs, see section 1 8 3 of the FRP checklist

o F13 Inadequate site diagrams as required by 40 CFR Part 112 20(h)(9) Incomplete information on Site Plan, Drainage Plan, and/or ~~Evacuation Plan~~ diagrams see section 1 9 of the FRP checklist

E14 Inadequate description of facility security systems as required by 40 CFR Part 112 20(h)(10) Incomplete description of security systems see section 1 10 of the FRP checklist

SPILL PREVENTION CONTROL AND COUNTERMEASURE

[For specific deficiencies see Attachment B SPCC Checklist]

STATE DEFICIENCIES BELOW THAT APPLY FOLLOWED BY WHY THEY APPLY EXAMPLE
Inadequate secondary containment or diversionary structures as required by 40 CFR Part 112 7(e)(2(ii) and (c)(1) Secondary containment for tank ___ was eroded at the south berm If SPCC Plan deficiency, insert "insufficient/incomplete/inadequate discussion of" where appropriate

SPCC plan inadequately implemented as required by 40 CFR Part 112 3 due to the deficiencies listed below

S1 SPCC plan not prepared certified by a P E and/or not available as required by 40 CFR 112 3

S2 No evidence of management approval of SPCC plan as required by 40 CFR Part 112 7

S3 No evidence of three year review and/or certified amendments as required by 40 CFR Part 112 5

S4 Insufficient or no prediction of equipment failure and resulting discharge as required by 40 CFR Part 112 7(b)

S5 Insufficient or no discussion of appropriate containment and/or diversionary structures or equipment in plan as required by 40 CFR Part 112 7(c)

S6 Insufficient demonstration of impracticality of secondary containment and/or no strong contingency plan (40 CFR Part 109) as required by 40 CFR Part 112 7(d)

S7 Incomplete or no written procedures and/or inspection records as required by 40 CFR Part 112 7(e)(8)

S8 Incomplete or no personnel training and spill prevention procedures as required by 40 CFR Part 112 7(e)(10)

ONSHORE FACILITIES (EXCLUDING PRODUCTION)

S9 Inadequate diked-area drainage equipment or procedure, and/or in-plant drainage system not adequately engineered [40 CFR Part 112 7(e)(1) and 112 7(e) (2)(iii)]

S10 Inadequate tank construction materials and/or materials not compatible with contents [40 CFR Part 112 7 (e)(2)(i)]

S11 Inadequate secondary containment or diversionary structures [40 CFR Part 112 7 (e)(2)(ii) and (c)(1)]

Standardized comments for secondary containment

Erosion of secondary containment berms
Breach in the secondary containment berm(s)
Capacity of the secondary containment is inadequate to contain the contents of the largest tank
Excessive vegetation in the secondary containment
Excessive pooling of liquids in the secondary containment
Secondary containment construction design/materials is not sufficiently impermeable to the potential (tank) contents

S12 Buried and partially buried tanks not protected from corrosion and/or subjected to regular pressure testing as required by 40 CFR Part 112 7(e)(2)(iv) and (v)

S13 Inadequate maintenance of aboveground tanks and/or tanks not subject to periodic inspection, integrity testing and/or records of inspection not maintained [40 CFR Part 112 7(e)(2)(vi)]

example comments

excessive corrosion of tank
excessive weeping/leaking from tank rivets/bolts/seams
advanced foundation erosion or settling

S14 Steam return from internal heating coils not monitored or passed through a separation system as required by 40 CFR Part 112 7(e)(2)(vii)

S15 Tank installations not fail-safe engineered as required by 40 CFR Part 112 7(e)(2)(viii)

S16 Facility effluent discharged to navigable waters not observed frequently enough to detect system upsets as required by 40 CFR Part 112 7(e)(2)(ix)

S17 Visible oil leaks resulting in accumulations of oil in diked areas not promptly corrected as required by 40 CFR Part 112 7(e)(2)(x)

S18 Portable oil storage tanks not positioned to prevent spilled oil from reaching navigable waters or are located in possible flooding area [40 CFR Part 112 7(e)(2)(xi)]

O ~~S19~~ Inadequate facility transfer operations pumping, and in plant processes [40 CFR Part 112 7(e)(3)] **choose what applies** (i) corrosion protection for buried pipelines (ii) not-in service or extended standby transfer points capped or blank

flanged and marked as to origin, (iii) piping supports to minimize abrasion, corrosion and allow expansion/contraction, (iv) aboveground valves and pipelines inspected regularly and periodically pressure tested (v) vehicle traffic warned of aboveground pipelines

S20 Inadequate facility tank car and tank truck loading and unloading rack and/or loading procedures [40 CFR Part 112 7(e)(4)] **choose what applies** (i) secondary containment for rack (ii) warning or barriers to prevent vehicular departure prior to disconnect (iv) vehicle inspection prior to departure

S21 Inadequate facility security [40 CFR Part 112 7(e)(9)] **choose what applies** (i) fenced with locked and or guarded gates (ii) locked, closed tank drain valves which allow outside flow (iii) locked pump controls are only accessible to authorized personnel (iv) load/unload connections capped or blank flanged when out-of-service or extended standby, (v) facility lighting for spill discovery and or vandalism prevention

OIL PRODUCTION FACILITY (ONSHORE)

S9 Inadequate secondary containment drainage procedures and/or oil accumulation removal from ditches traps sumps or skimmers {40 CFR Part 112 7(e)(5)(ii)]

S10 Inadequate tank construction materials and/or materials not compatible with contents [40 CFR Part 112 7(e)(5)(iii)(A)]

S11 Inadequate secondary containment [40 CFR Part 112 7(e)(5)(iii)(B) and (c)(1)]

Standardized comments for secondary containment

Erosion of secondary containment berms
Breach in the secondary containment berm(s)
Capacity of the secondary containment is inadequate to contain the contents of the largest tank
Excessive vegetation in the secondary containment
Excessive pooling of liquids in the secondary containment
Secondary containment construction design/materials is not sufficiently impermeable to the potential (tank) contents

S12 Inadequate maintenance inspection of storage tanks including foundations and or supports [40 CFR Part 112 7(e)(5)(iii)(C)]

Example comments

excessive corrosion of tank
excessive weeping/leaking from tank rivets/bolts/seams
advanced foundation erosion or settling

S13 Tank installations not-fail safe engineered [40 CFR Part 112 7(e)(5)(iii)(D)] (1) inadequate tank capacity to prevent overfill, (2) Insufficient or no equalizing lines between tanks, (3) inadequate vacuum protection for tanks (4) Insufficient or no high level sensors where facility is part of a computer production control system

S14 Inadequate maintenance/inspection of pipelines valves, flowlines pumping well polish rod stuffing boxes etc [40 CFR Part 112 7(e)(5)(iv)]

OFFSHORE PRODUCTION

S9 Inadequate or no oil drainage collection equipment/system (Such as curbing, drip pans, and sump system) [40 CFR Part 112 7(e)(7)(ii)]

S10 Inadequate maintenance/inspection of sump system [40 CFR Part 112 7(e) (7)(iii)]

S11 Separators/treaters not engineered to prevent oil discharges and/or inadequate spill prevention system [40 CFR Part 112 7(e)(7)(iv)]

S12 Tanks not engineered to prevent oil discharges and/or inadequate system [40 CFR Part 112 7(e)(7)(v) or (vi)]

S13 Tanks not suitably corrosion protected [40 CFR Part 112 7(e)(7)(vii)]

S14 Inadequate maintenance inspection and testing of pollution prevention equipment and systems and/or written procedures maintained at facility and plan as required by 40 CFR Part 112 7(e)(7)(viii) and (ix)

S15 Manifold not equipped with check valves for all flowlines [40 CFR Part 112 7(e)(7)(xiv)]

S16 No high-pressure sensing devices/wellhead shut in valves/alternate pressure relief system [40 CFR Part 112 7(e)(7)(xv)]

S17 Inadequate corrosion protection of facility pipelines [40 CFR Part 112 7(e) (7)(xvi)(xvii), and (xviii)]

EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT

- No deficiencies were identified under EPCRA The facility had filed the proper chemical inventory reports (Tier II) under EPCRA for the preceding calendar year at the time of the notice of inspection

OR

- The facility had not filed the proper chemical inventory reports (Tier II) under EPCRA at the time of the notice of inspection for the preceding calendar year

ADDITIONAL COMMENTS AND RECOMMENDATIONS

Based on the operational interviews and field inspection the following are recommendations which may improve or enhance the response capability for this facility

use statements suggested by EPA team leader, such as

- You should discuss command and control operations (incident command system/unified command system) with your spill response contractor Command center accommodations and communications during a spill should be identified and stated in the FRP

- It is recommended that you contact the Local Emergency Planning Committee (LEPC) concerning your Facility Response Plan to facilitate coordination with community emergency response activities and to make your plan available to the LEPC upon their request

- It is recommended that you contact your spill response contractor regarding spill mitigation procedures This includes mechanical methods to be employed by spill cleanup contractor

- It is recommended that recognized training for spill prevention and response be scheduled and implemented for response personnel

If the facility plans to decommission tanks

- If any fuel oil ASTs are to be decommissioned, the procedures stated in the proposed SPCC regulations under the definition of permanently closed tank should be used [40 CFR Part 112 2(o)]

If the facility is located on a lake (TU facilities)

- The (dam and/or water intake operator) should be contacted about the oil spill possibility and the procedures to be used for 24-hour notification of a spill to the lake

According to Section 4301(b) of the Oil Pollution Act (OPA), owners or operators of facilities subject to Part 112 who violate the requirements of this part 112 by failing or refusing to comply with any of the provisions shall be liable for a civil penalty of up to $27 500 for each day such violation continues

Please provide to this office within 30 days of the date of receipt of this report information photographs etc as necessary to clearly demonstrate that the above deficiencies have been corrected or provide a firm schedule for achieving compliance with the oil pollution regulations

If no response is received within 30 days potential enforcement actions may follow Please provide your response to

Name of EPA Inspector (6SF-RP)
Environmental Protection Agency
P O Box 303
Dallas Texas 75221

If you have any questions regarding this correspondence, please contact **(Name of EPA Inspector)** at 214/665-**extn**

Sincerely

Donald P Smith
Senior On-Scene Coordinator (6SF-RP)
214/245-1134

Attachments

A FRP Checklist
B SPCC Checklist

ATTACHMENT A

FRP CHECKLIST

FACILITY RESPONSE PLAN CHECKLIST

COVER SHEET

SITE NUMBER TBA **FY- INSPECTION** FY-97-013

FRP ID# FRP06A1173 **REGIONAL ID#** FRP-06-AR-00042

Facility Name ARKANSAS TERM & TRAD-NO **Owner/ Operator** ARKANSAS TERM & TRAD

MSO N/A

Inspectors Name **Affiliation** START

Date of Plan Review 04/01/1997 **Date of Field Inspection** 03/27/1997

Compliance with Appendix F to Part 112

☐ The Facility Response Plan follows the specific format in Appendix F to Part 112

☒ The Facility Response Plan does not follow the specific format in Appendix F to Part 112 but includes an Emergency Response Action Plan as specified in paragraph (h)(i) that is supplemented with a cross-reference section to identify the location of elements listed in paragraphs (h)(2) through (h)(11) of 40 CFR 112 20

☐ The Facility Response Plan does not follow the specific format in Appendix F to Part 112 and is not supplemented with a cross-reference section to identify the location of elements listed in paragraphs (h)(1) through (h)(11) of 40 CFR 112 20

CHECKLIST FOR VERIFYING COMPLIANCE WITH FACILITY RESPONSE PLAN REQUIREMENTS FRP IIFRP 06 AR 00042

REVIEW ITEMS	ADEQUATELY ADDRESSED	
Note Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule	**PLAN**	**FIELD**
Response Plan Cover Sheet (sec 2 0)	● YES ○ NO	
- General Information (sec 2 1)	● YES ○ NO	
- Applicability of Substantial Harm Criteria (sec 2 2)	● YES ○ NO	
- Certification (sec 2 3)	● YES ○ NO	

Please use the following space to note any missing or incomplete information

OK

Emergency Response Action Plan (ERAP) (sec 1 1)	● YES ○ NO	
- Qualified Individual (QI) Information (sec 1 2)	● YES ✓ NO	
- Emergency Notification List (sec 1 3 1)	● YES ○ NO	
- Spill Response Notification Form (sec 1 3 1)	● YES ○ NO	
- Response Equipment List and Location (sec 1 3 2)	● YES ✓ NO ○ N/A	
- Response Equipment Testing and Deployment (sec 1 3 3)	○ YES ● NO ○ N/A	
- Facility Response Team List (sec 1 3 4)	● YES ✓ NO	
- Evacuation Plan (sec 1 3 5)	● YES ✓ NO	
- Immediate Actions (sec 1 7 1)	● YES ○ NO	

REVIEW ITEMS	ADEQUATELY ADDRESSED	
Note Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule	**PLAN**	**FIELD**
- Facility Diagrams (sec 1 9)	● YES ○ NO	

*The sections above should be extracted from the more detailed corresponding sections of the plan Please use the following space to note any missing or incomplete information

Need to address equipment testing and deployment in plan

Facility Information (sec 1 2)		
- Facility name (sec 1 2 1)	● YES ✓ NO	
- Street address	● YES ○ NO ○ N/A	
- City state zip	○ YES ● NO ○ N/A	
- County	● YES ○ NO ○ N/A	
- Phone number	● YES ○ NO ○ N/A	
- Latitude/longitude (sec 1 2 2)	● YES ○ NO	
- Wellhead protection area (sec 1 2 3)	● YES ○ NO ○ N/A	
- Owner/operator (both names included if different) (sec 1 2 4)	● YES ○ NO	
- QI Information (sec 1 2 5) (Name position street address phone numbers)	● YES ○ NO	● YES ○ NO
- Description of specific response training experience	● YES ○ NO	○ YES ● NO
- Oil storage start up date (sec 1 2 6)	● YES ○ NO	
- Facility operations description (sec 1 2 7)	● YES ○ NO	

REVIEW ITEMS	ADEQUATELY ADDRESSED	
Note Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule	**PLAN**	**FIELD**
- Standard Industrial Classification code	● YES ○ NO	
- Dates and types of substantial expansion (sec 1 2 8)	● YES ○ NO ○ N/A	

Please use the following space to note any missing or incomplete information

Zip code missing
Q I needs training

Emergency Response Information (sec 1 3)		
Notification (sec 1 3 1)	● YES ○ NO	
- Emergency Notification Phone List	● YES ○ NO	
National Response Center phone number	● YES ○ NO	
QI (day and evening) phone number	● YES ○ NO	
Company response team (day and evening) phone numbers	● YES ○ NO	
Federal On Scene Coordinator (OSC) and/or Regional responce center (day and evening) phone numbers	● YES ○ NO	
Local response team phone numbers (Fire Department/Cooperatives)	● YES ○ NO	
Fire marshal (day and evening) phone numbers	● YES ○ NO ○ N/A	
SERC (day and evening) phone numbers	● YES ○ NO	
State police phone number	● YES ○ NO	
LEPC phone number	● YES ○ NO	

REVIEW ITEMS	ADEQUATELY ADDRESSED	
Note Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule	**PLAN**	**FIELD**
Wastewater treatment facility(s) name and phone number (recommended)	○ YES ○ NO ● N/A	
Local water supply system (day and evening) phone numbers	● YES ○ NO ○ N/A	
Weather report phone number	● YES ○ NO	
Local TV/radio phone number(s) for evacuation notification	● YES ○ NO	
Hospital phone number	● YES ○ NO	
- Spill Response Notification Form	● YES ○ NO	

Please use the following space to note any missing or incomplete information

Good

Response Equipment List (sec 1 3 2)	● YES ○ NO ○ N/A	
- Skimmers/Pumps	● YES ○ NO ○ N/A	● YES ○ NO ○ N/A
Operational Status	● YES ○ NO ○ N/A	● YES ○ NO ○ N/A
Type Model and Year	○ YES ● NO ○ N/A	
Number of or Quantity	● YES ○ NO ○ N/A	
Capacity	○ YES ● NO ○ N/A	
Daily Effective Recovery Rate	○ YES ● NO ○ N/A	
Storage Location(s)	● YES ○ NO ○ N/A	

REVIEW ITEMS	ADEQUATELY ADDRESSED	
Note Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule	PLAN	FIELD
Date Fuel Last Changed	○ YES ● NO ○ N/A	
- Boom	● YES ○ NO ○ N/A	● YES ○ NO ○ N/A
Operational Status	○ YES ○ NO ● N/A	● YES ○ NO ○ N/A
Type Model and Year	○ YES ○ NO ● N/A	
Number	○ YES ○ NO ● N/A	
Size (length)	○ YES ○ NO ● N/A	● YES ○ NO ○ N/A
Containment Area	○ YES ○ NO ● N/A	
Storage Location	○ YES ○ NO ● N/A	
- Chemicals Stored	● YES ○ NO ○ N/A	○ YES ○ NO ● N/A
Type	○ YES ○ NO ● N/A	○ YES ○ NO ● N/A
Quantity	○ YES ○ NO ● N/A	
Shelf life	○ YES ○ NO ● N/A	
Date Authorized	○ YES ○ NO ● N/A	
- Dispersant Dispensing Equipment	● YES ○ NO ○ N/A	○ YES ○ NO ● N/A
Operational Status	○ YES ○ NO ● N/A	○ YES ○ NO ● N/A
Type and Year	○ YES ○ NO ● N/A	
Capacity	○ YES ○ NO ● N/A	

REVIEW ITEMS	ADEQUATELY ADDRESSED	
Note Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule	**PLAN**	**FIELD**
Storage Location	○ YES ○ NO ● N/A	
Response Time	○ YES ○ NO ● N/A	
- Sorbents	● YES ○ NO ○ N/A	● YES ○ NO ○ N/A
Operational Status	● YES ○ NO ○ N/A	● YES ○ NO ○ N/A
Type and Year Purchased	○ YES ○ NO ● N/A	● YES ○ NO ○ N/A
Amount	● YES ○ NO ○ N/A	
Absorption Capacity	● YES ○ NO ○ N/A	
Storage Location(s)	● YES ○ NO ○ N/A	
- Hand Tools	● YES ○ NO ○ N/A	● YES ○ NO ○ N/A
Operational Status	● YES ○ NO ○ N/A	
Type and Year	● YES ○ NO ○ N/A	
Quantity	● YES ○ NO ○ N/A	
Storage Location	● YES ○ NO ○ N/A	
- Communication Equipment	● YES ○ NO ○ N/A	○ YES ○ NO ● N/A
Operational Status	○ YES ○ NO ● N/A	○ YES ○ NO ● N/A
Type and Year	○ YES ○ NO ● N/A	
Quantity	○ YES ○ NO ● N/A	

REVIEW ITEMS	ADEQUATELY ADDRESSED	
Note Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule	**PLAN**	**FIELD**
Storage Location/Number	○ YES ○ NO ● N/A	
- Fire Fighting and Personnel Protective Equipment	● YES ○ NO ○ N/A	● YES ○ NO ○ N/A
Operational Status	● YES ○ NO ○ N/A	● YES ○ NO ○ N/A
Type and Year	○ YES ○ NO ● N/A	○ YES ○ NO ● N/A
Quantity	● YES ○ NO ○ N/A	
Storage Location	● YES ○ NO ○ N/A	● YES ○ NO ○ N/A
- Other (e g Heavy Equipment Boats and Motors)	● YES ○ NO ○ N/A	● YES ○ NO ○ N/A
Operational Status	● YES ○ NO ○ N/A	● YES ○ NO ○ N/A
Type and Year	● YES ○ NO ○ N/A	● YES ○ NO ○ N/A
Quantity	● YES ○ NO ○ N/A	
Storage Location	● YES ○ NO ○ N/A	

Please use the following space to note any missing or incomplete information

Year missing in description of some equipment Other information such as capacity daily effective recovery rate and fuel change missing for some equipment

Response Equipment Testing and Deployment Drill Log (sec 1 3 3)	○ YES ● NO ○ N/A	○ YES ● NO ○ N/A
- Date of Last Inspection or Equipment Test	○ YES ● NO ○ N/A	
- Inspection Frequency	○ YES ● NO ○ N/A	

REVIEW ITEMS	ADEQUATELY ADDRESSED	
Note Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule	**PLAN**	**FIELD**
- Date of Last Deployment Drill	○ YES ● NO ○ N/A	
- Deployment Frequency	○ YES ● NO ○ N/A	
- Oil Spill Response Organization (OSRO) Certification	● YES ○ NO ○ N/A	

Please use the following space to note any missing or incomplete information

Deficient

Personnel (sec 1 3 4)	○ YES ● NO	
- Emergency Response Personnel Information	● YES ○ NO	
Name	● YES ○ NO	
Phone numbers	● YES ○ NO	
Response time	○ YES ● NO	
Responsibility	● YES ○ NO	
Type and date of response training	○ YES ● NO	
- Emergency Response Contractor Information	● YES ○ NO ○ N/A	● YES ○ NO ○ N/A
Name	● YES ○ NO ○ N/A	
Phone numbers	● YES ○ NO ○ N/A	
Response time	○ YES ● NO ○ N/A	

REVIEW ITEMS	ADEQUATELY ADDRESSED	
Note Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule	**PLAN**	**FIELD**
Evidence of contractual arrangements	● YES ○ NO ○ N/A	
- Facility Response Team Information	● YES ○ NO	
Job title/position of emergency response personnel	● YES ○ NO	
Response time	○ YES ● NO	
Phone/pager	● YES ○ NO	
Name of emergency response contractor (Contractors providing facility response team services may be different than contractors providing oil spill response services)	● YES ○ NO ○ N/A	
Response time	● YES ○ NO ○ N/A	
Phone/pager	● YES ○ NO ○ N/A	

Please use the following space to note any missing or incomplete information

No response times are listed for personnel

Evacuation Plans (sec 1 3 5)	○ YES ● NO ○ N/A	● YES ○ NO ○ N/A
- Facility Evacuation Plan (sec 1 3 5 1)	● YES ○ NO ○ N/A	● YES ○ NO ○ N/A
Location of stored materials	● YES ○ NO ○ N/A	● YES ○ NO ○ N/A
Hazard imposed by spilled materials	● YES ○ NO ○ N/A	● YES ○ NO ○ N/A
Spill flow direction	● YES ○ NO ○ N/A	● YES ○ NO ○ N/A
Prevailing wind directions and speed	○ YES ● NO ○ N/A	● YES ○ NO ○ N/A

REVIEW ITEMS	ADEQUATELY ADDRESSED	
Note Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule	**PLAN**	**FIELD**
Water currents tides or wave conditions (if applicable)	○ YES ● NO ○ N/A	○ YES ● NO ○ N/A
Arrival route of emergency response personnel and response equipment	○ YES ● NO ○ N/A	● YES ○ NO ○ N/A
Evacuation routes	● YES ○ NO ○ N/A	● YES ○ NO ○ N/A
Alternative routes of evacuation	● YES ○ NO ○ N/A	● YES ○ NO ○ N/A
Transportation of injured personnel to nearest emergency medical facility	○ YES ● NO ○ N/A	● YES ○ NO ○ N/A
Location of alarm/notification systems	○ YES ● NO ○ N/A	○ YES ○ NO ● N/A
Centralized check in area for roll call	● YES ○ NO ○ N/A	● YES ○ NO ○ N/A
Mitigation command center location	○ YES ● NO ○ N/A	● YES ○ NO ○ N/A
Location of shelter at facility	○ YES ● NO ○ N/A	● YES ○ NO ○ N/A
- Community Evacuation Plans referenced (sec 1 3 5 3)	○ YES ● NO ○ N/A	○ YES ○ NO ● N/A

Please use the following space to describe the evacuation plan being careful to note any observations/information (i e viability usability) that would be helpful in making a determination of sufficiency or deficiency

Need to reference community evacuation plans Several items are missing for the evacuation plans Q I needs to have a better understanding of the spill pathway

Description of Qualified Individual's Duties (sec 1 3 6)	● YES ○ NO	● YES ○ NO
- Activate internal alarms and hazard communication systems	● YES ○ NO	● YES ○ NO
- Notify response personnel	● YES ○ NO	● YES ○ NO
- Identify character exact source amount and extent of the release	● YES ○ NO	● YES ○ NO

REVIEW ITEMS	ADEQUATELY ADDRESSED	
Note Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule	**PLAN**	**FIELD**
- Notify and provide information to appropriate Federal State and local authorities	● YES ○ NO	● YES ○ NO
- Assess interaction of spilled substance with water and/or other substances stored at facility and notify on scene response personnel of assessment	● YES ○ NO	● YES ○ NO
- Assess possible hazards to human health and the environment	● YES ○ NO	● YES ○ NO
- Assess and implement prompt removal actions	● YES ○ NO	● YES ○ NO
- Coordinate rescue and response actions	● YES ○ NO	● YES ○ NO
- Access company funding to initiate cleanup activities	● YES ○ NO	● YES ○ NO
- Direct cleanup activities	● YES ○ NO	● YES ○ NO

Please use the following space to note any missing or incomplete information

OK

Hazard Evaluation (sec 1 4)		
Hazard Identification (sec 1 4 1)	● YES ○ NO	
- Tank and Surface Impoundment Forms	● YES ○ NO	
Tanks	● YES ○ NO	
Tank Number(s)	● YES ○ NO	
Substance(s) Stored	● YES ○ NO	
Quantity(s) Stored	● YES ○ NO	

REVIEW ITEMS	ADEQUATELY ADDRESSED	
Note Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule	**PLAN**	**FIELD**
Tank Type(s)/Year(s)	● YES ○ NO	
Maximum Capacity(s)	● YES ○ NO	
Failure(s)/Cause(s)	● YES ○ NO ○ N/A	
Surface Impoundments (SI)	● YES ○ NO ○ N/A	
SI Number(s)	○ YES ○ NO ● N/A	
Substance(s) Stored	○ YES ○ NO ● N/A	
Quantity(s) Stored	○ YES ○ NO ● N/A	
Surface Area(s)/Year(s)	○ YES ○ NO ● N/A	
Maximum Capacity(s)	○ YES ○ NO ● N/A	
Failure(s)/Cause(s)	○ YES ○ NO ● N/A	
- Labeled schematic drawing	○ YES ○ NO ● N/A	
- Description of transfers (loading and unloading) and volume of material	● YES ○ NO ○ N/A	
- Description of daily operations	● YES ○ NO ○ N/A	
- Secondary containment volume	● YES ○ NO ○ N/A	

REVIEW ITEMS	ADEQUATELY ADDRESSED	
Note Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule	**PLAN**	**FIELD**
- Normal daily throughput of the facility	● YES ○ NO ○ N/A	

Please use the following space to note any missing or incomplete information

OK

Vulnerability Analysis (sec 1 4 2)	● YES ○ NO	● YES ○ NO
- Analysis of potential effects of an oil spill on vulnerable areas	● YES ○ NO	
Water intakes	● YES ○ NO ○ N/A	
Schools	● YES ○ NO ○ N/A	
Medical facilities	● YES ○ NO ○ N/A	
Residential areas	● YES ○ NO ○ N/A	
Businesses	● YES ○ NO ○ N/A	
Wetlands or other sensitive environments	● YES ○ NO ○ N/A	
Fish and wildlife	○ YES ● NO ○ N/A	
Lakes and streams	● YES ○ NO ○ N/A	
Endangered flora and fauna	○ YES ● NO ○ N/A	
Recreational areas	● YES ○ NO ○ N/A	
Transportation routes (air land and water)	○ YES ○ NO ● N/A	

REVIEW ITEMS	ADEQUATELY ADDRESSED	
Note Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule	**PLAN**	**FIELD**
Utilities	○ YES ○ NO ● N/A	
Other applicable areas	○ YES ○ NO ● N/A	

Please use the following space to assess the description of the vulnerability analysis being careful to note any observations/information that would be helpful in making a determination of sufficiency or deficiency

No description of impacted wildlife in plan

Analysis of the Potential for an Oil Spill (sec 1 4 3)	● YES ○ NO	
- Description of likelihood of release occurring	● YES ○ NO	
Oil spill history for the life of the facility	● YES ○ NO	
Horizontal range of potential spill	● YES ○ NO	
Vulnerability to natural disaster	● YES ○ NO	
Tank age	● YES ○ NO	
Other factors (e g unstable soils earthquake zones Karst topography etc)	● YES ○ NO ○ N/A	
Facility Reportable Oil Spill History Description (sec 1 4 4)	● YES ○ NO	
Date of discharge(s)	○ YES ○ NO ● N/A	
List of discharge causes	○ YES ○ NO ● N/A	
Material(s) discharged	○ YES ○ NO ● N/A	
Amount of discharges in gallons	○ YES ○ NO ● N/A	

REVIEW ITEMS	ADEQUATELY ADDRESSED	
Note Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule	**PLAN**	**FIELD**
Amount that reached navigable waters (if applicable)	○ YES ○ NO ● N/A	
Effectiveness and capacity of secondary containment	○ YES ○ NO ● N/A	
Clean up actions taken	○ YES ○ NO ● N/A	
Steps taken to reduce possibility of reoccurrence	○ YES ○ NO ● N/A	
Total oil storage capacity of tank(s) or impoundment(s) from which material discharged	○ YES ○ NO ● N/A	
Enforcement actions	○ YES ○ NO ● N/A	
Effectiveness of monitoring equipment	○ YES ○ NO ● N/A	
Spill detection	○ YES ○ NO ● N/A	

Please use the following space to note any missing or incomplete information

OK

Discharge Scenarios (sec 1 5)		
Small Discharges (sec 1 5 1)	● YES ○ NO	
- Description of small discharge scenarios addressing facility operations and components (sec 1 5 1 1)	● YES ○ NO	
Loading and unloading operations	● YES ○ NO ○ N/A	
Facility maintenance operations	● YES ○ NO ○ N/A	
Facility piping	● YES ○ NO ○ N/A	

REVIEW ITEMS	ADEQUATELY ADDRESSED	
Note Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule	**PLAN**	**FIELD**
Pumping stations and sums	● YES ○ NO ○ N/A	
Oil storage tanks	○ YES ○ NO ● N/A	
Vehicle refueling operations	○ YES ○ NO ● N/A	
Age and condition of facility and components	● YES ○ NO	
- Description of factors affecting response efforts (sec 1 5 1 2)	● YES ○ NO	
Size of spill	● YES ○ NO	
Proximity to downgradient water	● YES ○ NO	
Proximity to fish and wildlife and sensitive environments	● YES ○ NO	
Likelihood that discharge will travel offsite	● YES ○ NO	
Location of material spilled (i e on concrete pad or soil)	● YES ○ NO	
Material discharged	● YES ○ NO	
Weather or aquatic conditions	○ YES ● NO	
Available remediation equipment	● YES ○ NO	
Probability of a chain reaction or failures	● YES ○ NO	
Direction of spill pathway	● YES ○ NO	
Medium Discharges (sec 1 5 1)	● YES ✓ NO	
- Description of medium discharge scenarios addressing facility operations and components (sec 1 5 1 1)	● YES ○ NO	

REVIEW ITEMS	ADEQUATELY ADDRESSED	
Note Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule	**PLAN**	**FIELD**
Loading and unloading operations	● YES ○ NO ○ N/A	
Facility maintenance operations	● YES ○ NO ○ N/A	
Facility piping	● YES ○ NO ○ N/A	
Pumping stations and sumps	● YES ○ NO ○ N/A	
Oil storage tanks	○ YES ○ NO ● N/A	
Vehicle refueling operations	○ YES ○ NO ● N/A	
Age and condition of facility and components	● YES ○ NO	
- Description of factors affecting response efforts (sec 1 5 1 2)	● YES ○ NO	
Size of spill	● YES ○ NO	
Proximity to downgradient water	● YES ○ NO	
Proximity to fish and wildlife and sensitive environments	● YES ○ NO	
Likelihood that discharge will travel offsite	● YES ○ NO	
Location of material spilled (i e on concrete pad or soil)	● YES ○ NO	
Material discharged	● YES ○ NO	
Weather or aquatic conditions	○ YES ● NO	
Available remediation equipment	● YES ○ NO	
Probability of a chain reaction or failures	● YES ○ NO	

REVIEW ITEMS	ADEQUATELY ADDRESSED	
Note Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule	**PLAN**	**FIELD**
Direction of spill pathway	● YES ○ NO	

Please use the following space to assess the description of conditions at the facility being careful to note any observations/information that would be helpful in making a determination of sufficiency or deficiency

Need to include description of weather and aquatic conditions in plan

Worst Case Discharge (sec 1 5 2)	○ YES ● NO	
- Correct Worst Case Discharge calculation for specific type of facility	● YES ○ NO	
- Description of worst case discharge scenario	○ YES ● NO	● YES ○ NO
Loading and unloading operations	○ YES ○ NO ● N/A	
Facility maintenance operations	○ YES ○ NO ● N/A	
Facility piping	○ YES ○ NO ● N/A	
Pumping stations and sumps	○ YES ○ NO ● N/A	
Oil storage tanks	○ YES ○ NO ● N/A	
Vehicle refueling operations	○ YES ○ NO ● N/A	
Age and condition of facility and components	● YES ○ NO	
- Description of factors affecting response efforts (sec 1 5 1 2)	● YES ○ NO	● YES ○ NO
Size of spill	● YES ○ NO	● YES ○ NO
Proximity to downgradient water	● YES ○ NO	● YES ○ NO

REVIEW ITEMS	ADEQUATELY ADDRESSED	
Note Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule	**PLAN**	**FIELD**
Proximity to fish and wildlife and sensitive environments	● YES ○ NO	● YES ○ NO
Likelihood that discharge will travel offsite	● YES ○ NO	
Location of material spilled (i e on concrete pad or soil)	● YES ○ NO	● YES ○ NO
Material discharged	● YES ○ NO	● YES ○ NO
Weather or aquatic conditions	○ YES ● NO	● YES ○ NO
Available remediation equipment	● YES ○ NO	● YES ○ NO
Probability of a chain reaction or failures	● YES ○ NO	● YES ○ NO
Direction of spill pathway	● YES ○ NO	○ YES ● NO
Discharge Detection Systems (sec 1 6)		
Discharge Detection by Personnel (sec 1 6 1)	● YES ○ NO ○ N/A	● YES ○ NO ○ N/A
Description of procedures and personnel for spill detection	● YES ○ NO ○ N/A	
Description of facility inspections	● YES ○ NO ○ N/A	
Description of initial response actions	● YES ○ NO ○ N/A	
Emergency Response Information (referenced)	● YES ○ NO ○ N/A	

Please use the following space to assess the description of conditions at the facility and/or discharge detection being careful to note any observations/information that would be helpful in making a determination of sufficiency or deficiency

Deficient Information pertaining to worst case discharge missing from plan

REVIEW ITEMS	ADEQUATELY ADDRESSED	
Note Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule	**PLAN**	**FIELD**
Automated Discharge Detection (sec 1 6 2)	○ YES ○ NO ● N/A	○ YES ○ NO ● N/A
- Description of automatic spill detection equipment including overfill alarms and secondary containment sensors	○ YES ○ NO ● N/A	○ YES ○ NO ● N/A
- Description of alarm verification procedures and subsequent actions	○ YES ○ NO ● N/A	○ YES ○ NO ● N/A

Please use the following space to assess the description of automated discharge detection systems and related conditions at the facility being careful to note observations/information that would be helpful in making a determination of sufficiency or deficiency

OK

Plan Implementation (sec 1 7)		
- Identification of response resources for small medium and worst case spills (sec 1 7 1)	● YES ○ NO	
- Description of response actions	● YES ○ NO	
Emergency plans for spill response	● YES ○ NO	
Additional response training	● YES ○ NO ○ N/A	
Additional contracted help	● YES ○ NO ○ N/A	
Access to additional response equipment/experts	● YES ○ NO ○ N/A	
Ability to implement plan including response training and practice drills	● YES ○ NO ○ N/A	● YES ○ NO ○ N/A

REVIEW ITEMS	ADEQUATELY ADDRESSED	
Note Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule	**PLAN**	**FIELD**
Temporary Storage	● YES ○ NO	● YES ○ NO

Please use the following space to assess the adequacy of response resources and response actions for small medium and worst case spills be careful to note any observations/information that would be helpful in making a determination of sufficiency or deficiency

OK

Disposal Plan (sec 1 7 2)	○ YES ● NO	● YES ○ NO
- Description of procedures for recovering reusing decontaminating or disposing of materials	● YES ○ NO	● YES ○ NO
- Materials addressed in Disposal Plan (Recovered product contaminated soil contaminated equipment and materials personnel protective equipment decontamination solutions absorbents spent chemicals)	○ YES ● NO	● YES ○ NO
- Plan prepared in accordance with any Federal State and/or local regulations	○ YES ● NO	● YES ○ NO
- Plan addresses permits required to transport or dispose of recovered materials	○ YES ● NO	● YES ○ NO

Please use the following space to assess the description of procedures for recovering reusing decontaminating or disposing of materials being careful to note any observations/information that would be helpful in making a determination of sufficiency or deficiency

No discussion of regulations or permits

Containment and Drainage Planning (sec 1 7 3)	● YES ○ NO	● YES ○ NO
- Description of containing/controlling a spill through drainage	● YES ○ NO ○ N/A	
Containment volume	● YES ○ NO ○ N/A	
Drainage route from oil storage and transfer areas	● YES ○ NO ○ N/A	

REVIEW ITEMS	ADEQUATELY ADDRESSED	
Note Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule	**PLAN**	**FIELD**
Construction materials in drainage troughs	● YES ○ NO ○ N/A	
Type and number of valves and separators in drainage system	● YES ○ NO ○ N/A	
Sump pump capacities	● YES ○ NO ○ N/A	
Containment capacities of weirs and booms and their location	○ YES ○ NO ● N/A	
Other clean up materials	○ YES ○ NO ● N/A	

Please use the following space to assess the description of containing/controlling a spill through drainage being careful to note any observations/information that would be helpful in making a determinatin of sufficiency or deficiency

Self Inspection Training and Meeting Logs (sec 1 8)		
Facility Self Inspection (sec 1 8 1)	● YES ○ NO	● YES ○ NO
- Records of tank inspections contained or cross referenced in plan or maintained electronically	○ YES ● NO	● YES ○ NO
- Records of secondary containment inspections contained or cross referenced in plan or maintained electronically	○ YES ● NO	● YES ○ NO
- Response Equipment Checklist (sec 1 8 1 2)	● YES ○ NO ○ N/A	● YES ○ NO ○ N/A
Inventory (item and quantity)	● YES ○ NO ○ N/A	● YES ○ NO ○ N/A
Storage location	● YES ○ NO ○ N/A	● YES ○ NO ○ N/A
Accessibility (time to access and respond)	● YES ○ NO ○ N/A	● YES ○ NO ○ N/A
Operational status/condition	● YES ○ NO	● YES ○ NO ○ N/A

REVIEW ITEMS	ADEQUATELY ADDRESSED	
Note Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule	**PLAN**	**FIELD**
Actual use/testing (last test date and frequency of testing)	○ YES ● NO	○ YES ● NO ○ N/A
Shelf life (present age expected replacement date)	○ YES ● NO	○ YES ● NO ○ N/A
- Response Equipment Inspection Log	● YES ○ NO	● YES ○ NO ○ N/A
Inspection records maintained for 5 years	● YES ○ NO	● YES ○ NO ○ N/A

Please use the following space to assess the description of facility self inspection and adequacy of response equipment at facility being careful to note any observations/information that would be helpful in making a determination of sufficiency or deficiency

No descriptions of records being maintained in plan Facility does not follow PREP guidelines

Facility Drills/Exercises (sec 1 8 2)	● YES ○ NO	○ YES ● NO
- Description of drill/exercise program based on PREP guidelines or other comparable program	● YES ○ NO	○ YES ● NO
QI notification drill	● YES ○ NO	○ YES ● NO
Spill management team tabletop exercise	● YES ○ NO	○ YES ● NO
Equipment deployment exercise	● YES ○ NO	● YES ○ NO
Unannounced exercise	○ YES ● NO	○ YES ● NO
Area exercise	○ YES ● NO	○ YES ● NO
- Description of evaluation procedures for drill program	○ YES ● NO	
- Qualified Individual Notification Drill Log (sec 1 8 2 1) (Date company qualified individual emergency scenario evaluation)	○ YES ● NO	○ YES ● NO
- Spill Management Team Tabletop Drill Log (sec 1 8 2 2) (Date company qualified individual emergency scenario evaluation changes to be implmented time table for implementation)	○ YES ● NO	○ YES ● NO

REVIEW ITEMS	ADEQUATELY ADDRESSED	
Note Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule	**PLAN**	**FIELD**
Response Training (sec 1 8 3)	● YES ○ NO	
- Description of Response Training program (including topics)	● YES ○ NO	○ YES ● NO
- Personnel Response Training Logs (Name response training date/and number of hours prevention training date/ and number of hours)	● YES ○ NO	○ YES ● NO
- Discharge Prevention Meeting Logs (Date attendees)	● YES ○ NO	● YES ○ NO

Please use the following space to assess the description of the response training program being careful to note any observations/information that would be helpful in making a determination of sufficiency or deficiency

No oil spill training no HAZWOPR training Facility does not follow PREP guidelines

Diagrams (sec 1 9)		
Site Plan Diagram	● YES ○ NO	
Entire facility to scale	● YES ○ NO	
Above and below ground storage tanks	● YES ○ NO	
Contents and capacities of bulk oil storage tanks and drum oil storage areas	● YES ○ NO	
Process building	● YES ○ NO ○ N/A	
Transfer areas	● YES ○ NO ○ N/A	
Location and capacity of secondary containment systems	○ YES ● NO ○ N/A	
Location of hazardous materials	● YES ○ NO ○ N/A	
Location of communications and emergency response equipment	○ YES ● NO ○ N/A	

REVIEW ITEMS	ADEQUATELY ADDRESSED	
Note Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule	**PLAN**	**FIELD**
Location of electrical equipment that might contain oil	○ YES ○ NO ● N/A	

Please use the following space to note any missing or incomplete information

Site Drainage Plan Diagram	● YES ✓ NO	
- Major sanitary and storm sewers manholes and drains	● YES ○ NO ○ N/A	
- Weirs and shut off valves	● YES ○ NO ○ N/A	
- Surface water receiving streams	● YES ○ NO ○ N/A	
- Fire fighting water sources	○ YES ○ NO ● N/A	
- Other utilities	○ YES ○ NO ● N/A	
- Response personnel ingress and egress	○ YES ● NO	
- Response equipment transportation routes	○ YES ● NO	
- Direction of spill flow from discharge points	● YES ○ NO	

Please use the following space to note any missing or incomplete information

REVIEW ITEMS	ADEQUATELY ADDRESSED	
Note Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule	**PLAN**	**FIELD**
Site Evacuation Plan Diagram	● YES ○ NO	
- Evacuation routes	● YES ○ NO	
- Location of regrouping areas	● YES ○ NO	

Please use the following space to note any missing or incomplete information

OK

Site Security (sec 1 10)	● YES ○ NO	
- Description of facility security (Emergency cut off locations enclosures guards and their duties lighting valve and pump locks pipeline connection caps)	● YES ○ NO	● YES ○ NO

Please use the following space to assess the description of facility security being careful to note any observations/information that would be helpful in making a determination of sufficiency or deficiency

OK

ATTACHMENT B

SPCC CHECKLIST

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION 6

1445 Ross Avenue, Suite 1200

Dallas, Texas 75202-2733

ACKNOWLEDGEMENT AND RECORD OF SPCC INSPECTION/PLAN REVIEW

SPCC CASE # FY-INSP-970031 **FRP REGIONAL #** FRP-06-AR-00042 **DATE** 03/27/1997

Inspector Name: Myers Julian — EPA Region: 06

Inspection Team Members: Rajeev Matthew David Crow Tom Cochill Julian Myers

Name of Facility: ARKANSAS TERM & TRAD NORTH LITTLE ROCK

Latitude: 34-46 39 — Longitude: 092 10 52

Facility Address: 2207 Central Airport Road

City: NORTH LITTLE ROCK — County/ Parish: — State: AR — Zip:

Facility Contact: Bill House — Title: Terminal Manager

Telephone Number: 501 945-4681

Name of Owner/Operator: ARKANSAS TERM & TRAD

Corporate Address: ARKANSAS TERMINALING & TRADING

ROUTE 1 BOX 67A CENTRAL AIRPORT ROAD

City: NORTH LITTLE ROCK — State: AR — Zip: 72117

Corporate Contact: Benny Webb — Title: Environmental Manager

Telephone Number: 903 794 3845

Synopsis Of Business: Bulk Oil Storage and Distribution

How many employees at this Facility? 6

If unmanned number of employees to operate the Facility?

Sic Code: 5171

Route Of Entry: Out of secondary containment into wetlands associated with southern end of Stark Bend

Distance To Waterway (in feet): 1 500

Acknowledgement of Inspection

Company Contact: Denny Nanoff — Title: Maint Supervisor

EPA / TAT Inspector: — Title:

Memorandum of Understanding (check all applicable descriptions)

- [x] Non Transportation Related
- [ ] Transportation Related

- [x] EPA
- [ ] MMS
- [ ] USCG
- [ ] OPS

- [x] Onshore
- [ ] Offshore
- [ ] Drilling (EPA)
- [ ] Production (EPA)
- [ ] Refining
- [ ] In plant processing
- [ ] Waste Treatment
- [x] Storage (EPA)
- [x] Commercial
- [ ] Agriculture
- [ ] Industrial
- [ ] Public
- [x] Load/Unloading Racks
- [x] In Facility pipelines

- [ ] Drilling (MMS)
- [ ] Production (MMS)
- [ ] Storage (MMS)

- [ ] Over water Transfer (loading arms pipes Terminal)
- [ ] Oily ballast tanks
- [ ] Tank washings from vessels

- [ ] Inline/Breakout Tanks injected/reinjected for continuous pipeline operation

SPCC Part 112 1(b)

- [ ] Drilling
- [ ] Processing
- [ ] Consuming oil/oil products
- [ ] Producing
- [ ] Refining
- [x] Gathering
- [x] Transferring
- [x] Storing
- [x] Distributing

Facility Type

- [x] Bulk Storage
- [ ] Industrial
- [ ] Federal (Non Military)
- [ ] Auto Dealership
- [ ] Residential
- [ ] Gas Station/Convenience
- [ ] Utilities
- [ ] Federal (Military)
- [ ] Contractor
- [ ] Trucking/Transport
- [x] Petroleum Distributor
- [ ] Local Government
- [ ] Air Taxi (Airline)
- [ ] Farm
- [ ] Trustee/Native American
- [x] Commercial
- [ ] State Government
- [ ] Aircraft owner
- [ ] Railroad
- [ ] Other

Other _____

Does the Facility conform to any of the following industry standards (check all that apply)?

- [ ] API 620 Design and Construction of Large Welded Low Pressure Storage Tanks
- [x] API-650 Welded Steel Tanks for Oil Storage
- [ ] API 653 Tank Inspection Repair Alteration and Reconstruction
- [ ] API 2610 Design Construction Operation Maintenance and Inspection of Terminal and Tank Facilities
- [ ] UL 142 Steel Aboveground Tanks for Flammable and Combustible Liquids
- [ ] None
- [ ] Other Standard(s)

List Standard(s) of facility _____

Facility Startup Date 07/16/1980	Spcc Plan Required Date ✓
AST Storage Capacity(gal) 12 810 000	UST Storage Capacity(gal)
Annual Oil throughput(gal)	Production Rates (gal)
SPCC Plan prepared ● YES ○ NO	SPCC Plan available for review ● YES ○ NO
SPCC Plan available (during a normal 8 hr day)? ● YES ○ NO	SPCC Plan maintained on site? ● YES ○ NO
Facility is ○ UNATTENDED ● ATTENDED	(○ Daily (8 hrs) ● Daily (24 hrs) ○ Periodically)
SPCC Plan certified? ● YES ○ NO	Date Of Certification 03/21/1997
Name of Professional Engineer Michael D Henderson	
License Number 5357	State AR
SPCC Plan reviewed every three years? ● YES ○ NO	SPCC Plan review sign off? ● YES ○ NO
Does the SPCC Plan indicate that management has approved the plan? ● YES ○ NO	
Mgmt Personnel Name Rick Shingleur	
Mgmt Personnel Title Env Managers	

Have there been any prior releases at this Facility? ○ YES ● NO

If YES provide date(s) spill size(gal) and source of information

Date Spill size (gal) Info Source

Date Spill size (gal) Info Source

Date Spill size (gal) Info Source

Have there been reportable spills at this Facility per 40 CFR Part 110? ○ YES ● NO

Has the Facility had a spill of more than 1 000 gallons in the past 12 months? ○ YES ● NO

If YES provide Date of Spill Was Plan submitted per 40 CFR 112 4? ○ YES ○ NO

Has the Facility had two spills of a harmful quantity in the past 12 months? ○ YES ● NO

If YES provide Date of Spill Was Plan submitted per 40 CFR 112 4? ○ YES ○ NO

Has there been a change of facility design construction operation or maintenance which could affect the facility s potential for discharge? ● YES ○ NO

If YES describe

Added two tanks #6 and #7 jet fuel

Date of Latest Change 03/21/1997	Date Plan Amended 03/21/1997

	Plan Review	Field Inspection
GENERAL TOPICS 112 7 (b) (c) (d)		
Plan includes a prediction of equipment failure(s) which could result in a discharge from the Facility per 40 CFR 112 7 (b)	● YES ○ NO	
Plan discusses appropriate containment and/or diversionary structures or equipment per 40 CFR 112 7(c) Note Production Facility (i e process vessel)	● YES ○ NO	
Installation of structures or equipment listed in 112 7(c) was determined to be impracticable	○ YES ● NO	
If YES impracticability clearly demonstrated	○ YES ● NO	
If YES contingency plan per 40 CFR 109 provided	○ YES ● NO	
If YES written commitment of manpower provided	○ YES ● NO	
General Notes/Comments OK		
INSPECTIONS AND RECORDS 112 7 (e)(8)		
a Inspections required by 40 CFR 112 are in accordance with written procedures developed for the Facility	● YES ○ NO	● Adeq ○ Inad ○ N/A
b Written procedures and a record of inspections are signed by the appropriate supervisor or inspector	● YES ○ NO	● Adeq ○ Inad ○ N/A
c Written procedures and a record of inspections are made part of the SPCC Plan	● YES ○ NO	● Adeq ○ Inad ○ N/A
d Written procedures and a record of inspections are maintained for a period of three (3) years	● YES ○ NO	● Adeq ○ Inad ○ N/A
Comments based on inspection OK		

	Plan Review	Field Inspection
PERSONNEL TRAINING AND SPILL PREVENTION PROCEDURES 112 7(e)(10)		
a Training on the operation and maintenance of equipment to prevent the discharge of oil and applicable pollution control laws rules and regulations	● YES ○ NO	○ Adeq ● Inad ○ N/A
b Designated person accountable for spill prevention	● YES ○ NO	● Adeq ○ Inad ○ N/A
c Spill prevention briefings scheduled periodically	● YES ○ NO	● Adeq ○ Inad ○ N/A

Comments based on inspection

Pump off area drips Monitor wells have no caps Need oil spill training for field personnel

FACILITY DRAINAGE ONSHORE (excluding Production Facilities)		
a From diked storage areas via valves (Note flapper type valves should not be used)	● YES ○ NO	○ Adeq ○ Inad ○ N/A
b Diked storage areas drained via pumps or ejectors	○ YES ● NO	○ Adeq ○ Inad ● N/A
If YES are the pumps manually operated	● YES ○ NO	○ Adeq ○ Inad ● N/A
c Storm water inspected prior to discharge from the diked storage areas (see Bulk storage Tanks e Drainage from diked areas)	● YES ○ NO	● Adeq ○ Inad ○ N/A
d From undiked areas into catchment basins	● YES ○ NO	● Adeq ○ Inad ○ N/A
e If NO to b and d is there a diversion system to return spills to the Facility	○ YES ● NO	○ Adeq ○ Inad ● N/A
f Is drainage water treated at the Facility	● YES ○ NO	● Adeq ○ Inad ○ N/A

Comments based on inspection

Oil/water separator on site

	Plan Review	Field Inspection
BULK STORAGE TANKS ONSHORE (excluding production facilities) 112 7(e)(2) Note See Tank and Secondary Containment Forms		
a Material and construction of tanks are compatible to the oil stored and the conditions of storage such as pressure and temperature etc	● YES ○ NO	● Adeq ○ Inad ○ N/A
b All tank installations have secondary containment	● YES ○ NO	● Adeq ○ Inad ○ N/A
c Secondary containment appears to be adequate	● YES ○ NO	● Adeq ○ Inad ○ N/A
d Diked areas are sufficiently impervious	● YES ○ NO	● Adeq ○ Inad ○ N/A
e Drainage from diked areas to on site treatment	○ YES ● NO	○ Adeq ○ Inad ● N/A
If NO to e is the valve normally sealed closed	● YES ○ NO	● Adeq ○ Inad ○ N/A
If NO to e drainage from diked area is inspected	● YES ○ NO	● Adeq ○ Inad ○ N/A
If NO to e bypass valve is opened and resealed properly	● YES ○ NO	● Adeq ○ Inad ○ N/A
If NO to e adequate records of dike drainage are maintained	● YES ○ NO	● Adeq ○ Inad ○ N/A
f Underground tanks at the Facility	● YES ○ NO	● Adeq ○ Inad ○ N/A
If YES to f protected from corrosion	● YES ○ NO	● Adeq ○ Inad ○ N/A
If YES to f subject to regular pressure testing	● YES ○ NO	● Adeq ○ Inad ○ N/A
g Partially buried tanks at the Facility	○ YES ● NO	● Adeq ○ Inad ○ N/A
If YES are buried sections protected from corrosion	○ YES ○ NO	● Adeq ○ Inad ○ N/A
h Aboveground tanks at this Facility	● YES ○ NO	● Adeq ○ Inad ○ N/A

	Plan Review	Field Inspection
Does the plan indicate that visual inspections of the outside of tanks are performed?	● YES ○ NO	● Adeq ○ Inad ○ N/A
Subject to periodic integrity testing for Hydrostatic	○ YES ● NO	● Adeq ○ Inad ○ N/A
Subject to periodic integrity testing for Magnetic particle	● YES ○ NO	○ Adeq ○ Inad ● N/A
Subject to periodic integrity testing for Penetrant dye	○ YES ● NO	○ Adeq ○ Inad ● N/A
Subject to periodic integrity testing for Ultrasonic	○ YES ● NO	● Adeq ○ Inad ○ N/A
Subject to periodic integrity testing for Radiographic	○ YES ● NO	○ Adeq ○ Inad ● N/A
Subject to periodic integrity testing for Acoustic Emissions	○ YES ● NO	○ Adeq ○ Inad ● N/A
Subject to periodic integrity testing for Laser	○ YES ● NO	○ Adeq ○ Inad ● N/A
Subject to periodic integrity testing for Visual	● YES ○ NO	● Adeq ○ Inad ○ N/A
Subject to periodic integrity testing for Other	○ YES ● NO	○ Adeq ○ Inad ● N/A
Records of inspections maintained	● YES ○ NO	● Adeq ○ Inad ○ N/A
Internal heating coils utilized	○ YES ● NO	○ Adeq ○ Inad ● N/A
If YES steam return/exhaust monitored	○ YES ● NO	○ Adeq ○ Inad ● N/A
External heating system utilized	○ YES ● NO	○ Adeq ○ Inad ● N/A
Tanks are fail safe engineered	● YES ○ NO	● Adeq ○ Inad ○ N/A
Audible high liquid level alarm	○ YES ● NO	● Adeq ○ Inad ○ N/A

	Plan Review	Field Inspection
Visual high liquid level alarm	● YES ○ NO	● Adeq ○ Inad ○ N/A
Automatic high liquid level pump cutoff	● YES ○ NO	○ Adeq ○ Inad ● N/A
Communications between gauger and pumping station	● YES ○ NO	● Adeq ○ Inad ○ N/A
System of determining liquid level in tanks such as sensing devices (i e low high)	● YES ○ NO	● Adeq ○ Inad ○ N/A
Direct vision gauges	● YES ○ NO	● Adeq ○ Inad ○ N/A
Sensing devices and/or gauges regularly tested	● YES ○ NO	● Adeq ○ Inad ○ N/A
i Effluent discharges directly to navigable waters are observed frequently to detect oil spills?	● YES ○ NO	● Adeq ○ Inad ○ N/A
j Causes of oil leaks resulting in accumulations of oil in diked areas are promptly corrected?	● YES ○ NO	● Adeq ○ Inad ○ N/A
k Mobile or portable storage units at this Facility?	○ YES ● NO	● Adeq ○ Inad ○ N/A
If YES to k are positioned to prevent spilled oil from reaching navigable water	○ YES ● NO	○ Adeq ○ Inad ● N/A
If YES to k is a secondary means of containment provided	○ YES ● NO	○ Adeq ○ Inad ● N/A
If YES to k are located in an area NOT subject to periodic flooding	○ YES ● NO	○ Adeq ○ Inad ● N/A
l Have any tanks at this Facility been modified?	○ YES ● NO	○ Adeq ○ Inad ● N/A
Have any tanks been permanently closed?	○ YES ● NO	○ Adeq ● Inad ○ N/A
All liquid and sludge removed from each tank and connected lines?	○ YES ● NO	● Adeq ○ Inad ○ N/A
Each tank rendered free of explosive vapor?	○ YES ● NO	● Adeq ○ Inad ○ N/A

	Plan Review	Field Inspection
All connecting lines blanked off and valves closed and locked?	○ YES ● NO	○ Adeq ● Inad ○ N/A
Conspicuous signs posted on tank warning that it is a permanently closed tank?	○ YES ● NO	○ Adeq ● Inad ○ N/A
Comments based on inspection High level alarms on tank 6 and 7 Facility is planning to install alarms on the remiainder of the tanks by May 1997 No mention of permanently closed tanks in plan Status of out of service tanks in question		
FACILITY TRANSFER OPERATIONS PUMPING AND IN PLANT PROCESS ONSHORE (excluding Production Facilities) 112 7(e)(3)		
a Buried pipelines are corrosion protected?	● YES ○ NO	● Adeq ○ Inad ○ N/A
b Not in service pipelines are capped and blank flanged and marked as to their origin?	● YES ○ NO	○ Adeq ○ Inad ● N/A
c Pipe supports are designed to minimize abrasion and corrosion and allow for expansion and contraction?	● YES ○ NO	● Adeq ○ Inad ○ N/A
d Aboveground valves and pipelines are inspected regularly?	● YES ○ NO	● Adeq ○ Inad ○ N/A
Frequency Daily?	● YES ○ NO	● Adeq ○ Inad ○ N/A
Frequency Weekly?	○ YES ● NO	○ Adeq ○ Inad ● N/A
Frequency Monthly?	○ YES ● NO	○ Adeq ○ Inad ● N/A
Frequency Bi monthly?	○ YES ● NO	○ Adeq ○ Inad ● N/A
Frequency Annual?	○ YES ● NO	● Adeq ○ Inad ○ N/A
Frequency Semi Annual?	○ YES ● NO	○ Adeq ○ Inad ● N/A
Frequency other times?	○ YES ● NO	○ Adeq ○ Inad ● N/A

	Plan Review	Field Inspection
Spill containment curbing system provided?	● YES ○ NO	● Adeq ○ Inad ○ N/A
Spill containment drip pans system provided?	○ YES ● NO	● Adeq ○ Inad ○ N/A
Spill containment sorbent materials system provided?	○ YES ● NO	● Adeq ○ Inad ○ N/A
No spill containment system provided?	○ YES ● NO	○ Adeq ○ Inad ● N/A
Other spill containment system provided?	● YES ○ NO	○ Adeq ○ Inad ● N/A
e Periodic pressure testing of the valves and pipelines is conducted?	○ YES ● NO	● Adeq ○ Inad ○ N/A
Frequency Daily?	○ YES ● NO	○ Adeq ○ Inad ● N/A
Frequency Weekly?	○ YES ● NO	○ Adeq ○ Inad ● N/A
Frequency Monthly?	○ YES ● NO	○ Adeq ○ Inad ● N/A
Frequency annual?	○ YES ○ NO	● Adeq ○ Inad ○ N/A
Other frequency?	○ YES ○ NO	○ Adeq ○ Inad ● N/A
f Vehicle traffic warned of aboveground and belowground pipelines?	● YES ○ NO	● Adeq ○ Inad ○ N/A

Comments based on inspection

Plan does not mention the use of drip pans or sorbent materials No reference to pressure testing either

FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK ONSHORE 112 7 (e)(4)		
a Rack drainage flows to catchment basin?	● YES ○ NO	● Adeq ○ Inad ○ N/A

	Plan Review	Field Inspection
b Rack drainage flows to a treatment system?	● YES ○ NO	● Adeq ○ Inad ○ N/A
If NO to a or b is secondary containment used?	○ YES ● NO	○ Adeq ○ Inad ● N/A
c Is quick drainage system available?	● YES ○ NO	● Adeq ○ Inad ○ N/A
d Is a system used to prevent departure before complete disconnect from transfer lines?	● YES ○ NO	● Adeq ○ Inad ○ N/A
Interlock brake system (e g locking of air brakes)?	● YES ○ NO	● Adeq ○ Inad ○ N/A
Physical barrier system (i e wheel chocks)?	○ YES ● NO	○ Adeq ○ Inad ● N/A
Warning lights and/or signs?	● YES ○ NO	● Adeq ○ Inad ○ N/A
Automatic shutdown system located at the tank vehicle loading rack?	○ YES ● NO	● Adeq ○ Inad ○ N/A
e Vehicle inspection prior to transfer and departure?	● YES ○ NO	● Adeq ○ Inad ○ N/A
Comments based on inspection OK		
SECURITY (excluding Production Facilities) 112 7 (e)(9)		
a Facility is fully fenced?	● YES ○ NO	● Adeq ○ Inad ○ N/A
b Entrance gates are locked and/or guarded?	● YES ○ NO	● Adeq ○ Inad ○ N/A
c Master flow and drain valves are secured in closed position when in a non operating or standby status?	● YES ○ NO	● Adeq ○ Inad ○ N/A
d Starter controls on pumps are locked in the off position or located at a site accessible only to authorized personnel when in non operating or standby status?	● YES ○ NO	● Adeq ○ Inad ○ N/A

	Plan Review	Field Inspection
e Transfer connection(s) of pipelines are capped or blank flanged when not in service?	● YES ○ NO	● Adeq ○ Inad ○ N/A
f Facility lighting appears to be adequate to facilitate the discovery of spills during hours of darkness and to deter vandalism?	● YES ○ NO	● Adeq ○ Inad ○ N/A
Comments based on inspection Sufficient lighting for continuous 24 hr operation ✓		
OIL PRODUCTION FACILITIES ONSHORE 112 7 (e)(5) Note See Tank and Secondary Containment Forms		
a Drains for the secondary containment systems at tank batteries and central treatment stations are closed and sealed at all times except when rainwater is being drained?	○ YES ○ NO	○ Adeq ○ Inad ○ N/A
b Prior to drainage accumulated oil on the rainwater is picked up and returned to storage or properly disposed of?	○ YES ○ NO	○ Adeq ○ Inad ○ N/A
c Field drainage ditches road ditches and oil traps sumps or skimmers are regularly inspected for oil	○ YES ○ NO	○ Adeq ○ Inad ○ N/A
Accumulated oil is removed?	○ YES ○ NO	○ Adeq ○ Inad ○ N/A
d Aboveground tanks at this Facility	○ YES ○ NO	○ Adeq ○ Inad ○ N/A
Material and construction are compatible with the oil stored and the conditions of storage	○ YES ○ NO	○ Adeq ○ Inad ○ N/A
Secondary means of containment appears adequate	○ YES ○ NO	○ Adeq ○ Inad ○ N/A
Tank inspections are conducted periodically	○ YES ○ NO	○ Adeq ○ Inad ○ N/A
By appropriate plant personnel	○ YES ○ NO	○ Adeq ○ Inad ○ N/A
Include tank foundation and supports	○ YES ○ NO	○ Adeq ○ Inad ○ N/A
Frequency Daily?	○ YES ○ NO	○ Adeq ○ Inad ○ N/A

	Plan Review	Field Inspection
Frequency Weekly?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Frequency Monthly?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Frequency Annual?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Other frequency?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Tank battery installations fail safe engineered	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Adequate tank capacity to prevent tank overfill	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Overflow equalizing lines between tanks	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Vacuum protection to prevent tank collapse	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
High level alarms	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
e Facility transfer operations at this Facility	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Aboveground valves/pipelines examined periodically?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Frequency Daily?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Frequency Weekly?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Frequency Monthly?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Frequency Annual?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Other frequency?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A

	Plan Review	Field Inspection
Brine disposal facilities examined often?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Flowline maintenance program established?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Records of inspection maintained?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Comments based on inspection		
OIL DRILLING AND WORKOVER FACILITIES OFFSHORE 112 7 (e)(7) Note See Tank and Secondary Containment Forms		
a Oil drainage collection equipment utilized?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Drains controlled/directed to central collection?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
b Sump system if used adequately sized?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Spare pump/equivalent method available?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Regularly scheduled preventative maintenance program to assure reliable operations of the liquid removal system and pump start up device?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
c Separators/treaters equipped with dump valves?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Measures in place should dump valve fail?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
d Atmospheric storage/surge tanks equipped with high level sensing devices?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
e Pressure tanks equipped with high and low pressure sensing devices?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
f Tanks have corrosion protection measures?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A

	Plan Review	Field Inspection
g Written procedure for inspecting and testing pollution prevention equipment and systems prepared?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Written procedure maintained at the Facility?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Written procedure included in SPCC Plan?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Inspections and tests conducted periodically?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Frequency Daily?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Frequency Weekly?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Frequency Monthly?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Frequency Annual?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Other frequency?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
h Surface and subsurface well shut in valves and devices are sufficiently described?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Detailed records for each well maintained?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
i Blowout preventer (BOP) assembly utilized in accordance with state regulatory agency requirements?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
j Well control measures provided in the event of emergency conditions?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
k Written instructions are prepared for contractors and subcontractors by the owner or operator?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Such instructions are maintained at the Facility?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
l Manifolds are equipped with check valves?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A

	Plan Review	Field Inspection
m Flowlines are equipped with high pressure sensing device and shuting valve at the wellhead?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
If NO is a pressure relief system provided?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
n Pipelines have corrosion protection?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
o Sub marine pipelines are stress protected?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Sub marine pipelines are inspected periodically?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Frequency Daily?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Frequency Weekly?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Frequency Monthly?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Frequency Annual?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Other frequency?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A
Inspections are documented and maintained?	◯ YES ◯ NO	◯ Adeq ◯ Inad ◯ N/A

Comments based on inspection